

PERKINS COIE

RECEIVED  
FEDERAL ELECTION COMMISSION  
2017 JAN 24 AM 7:51

700 13th Street, NW  
Suite 600  
Washington, D.C. 20005-3960

+1.202.654.6200  
+1.202.654.6211  
PerkinsCoie.com

January 23, 2017

CELA

Marc Erik Elias  
MElias@perkinscoie.com  
D. +1.202.434.1609  
F. +1.202.654.9126

Jeff S. Jordan, Esq.  
Assistant General Counsel  
Office of Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

Re: MUR 7204

Dear Mr. Jordan:

We write as counsel to Foster Campbell for U.S. Senate (the "Committee") and Ron Roberts, in his official capacity as treasurer of the Committee (collectively, "Respondents") in response to the complaint filed by Jeremy Gold on December 2, 2016 (the "Complaint"). Through the Complaint, Mr. Gold seeks to involve the Commission in an ongoing payment dispute between his company and the Committee. The Committee's reports have already showed debt to that company, and the Committee is amending its reports to show other disputed amounts the company claims it is owed. In the meantime, however, the Commission should follow the course it has taken in analogous cases, close the file without taking further action, and allow the Committee and Mr. Gold to settle this dispute among themselves.

#### I. FACTUAL BACKGROUND

Foster Campbell was a candidate for the U.S. Senate in Louisiana in 2016. Foster Campbell for U.S. Senate is his principal campaign committee. In April of 2016, the Committee retained The Gold Standard LLC (the "Gold Standard"), to perform fundraising consulting services through December of 2016. Jeremy Gold, the complainant, is the President of the Gold Standard. The Gold Standard was paid \$5,500 for services provided in April and \$5,500 for services provided in May in keeping with the original fee structure agreed to between the Committee and the Gold Standard.

By June, the Committee had become dissatisfied with the services provided by the Gold Standard. The Committee found that the company failed to devote the necessary time and energy to perform the consulting services required. Accordingly, the Committee and the company began to disagree over whether the Committee owed more fees. This disagreement persisted throughout the rest of the campaign. On November 3, Mr. Gold sent the Committee a letter demanding that the Committee adhere to the original payment terms. On December 2, Mr. Gold filed the Complaint in this matter.



Federal Election Commission  
January 23, 2017  
Page 3

The same course of action is appropriate here. The Committee has had and continues to have genuine and well-founded concerns about the sufficiency of the vendor's performance in this engagement. While it believes the company's current demands are unsupportable, it is amending its reports to show the full amount claimed as disputed debt. Under these circumstances, the Commission should close the file, take no further action and allow the Committee and the Gold Standard to independently settle the underlying payment dispute.

Very truly yours,



Marc E. Elias  
Jacquelyn K. Lopez

134224108.1